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LEBOEUF, LAMB, LEIBY & MACRAE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

520 MADISON AVENUE

1333 NEW HAMPSHIRE AVENUE, N. W. WASHINGTON, DC 20036

- .

500 KEARNS BUILDING 136 SOUTH MAIN SALT LAKE CITY, UT 84101

411 PEQUOT AVENUE SOUTHPORT, CT 06490 NEW YORK, NY 10022

(212) 715-8000

TELEX: 423416

TELECOPIER: 212-371-4840

LEBOEUF, LAMB, LEIBY & MACRAE (UK) 47 BERKELEY SQUARE LONDON WIX 5DB, ENGLAND

168 MILK STREET BOSTON, MA 02109

336 FAYETTEVILLE STREET MALL P. O. BOX 750 RALEIGH, NC 27602

> 150 STATE STREET ALBANY, NY 12207

June 22, 1983

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Robert E. Leininger, Esq. Office of Regional Counsel United States Environmental Protection Agency, Region V 230 South Dearborn Street Chicago, Illinois 60604

> Environmental Conservation and Chemical Corporation, Zionsville, Indiana; Response of St. Regis Corporation to EPA Region V Information Requests

Dear Mr. Leininger:

We represent St. Regis Corporation, formerly St. Regis Paper Company ("St. Regis"). Enclosed on behalf of St. Regis in connection with the above matter is a copy of St. Regis' response to EPA Region V's information requests, received on March 29 and April 8, 1983, relating to the Environmental Conservation and Chemical Corporation ("ECC") in Zionsville, Indiana. As you agreed on April 22, 1983, the time in which to respond to the information request, was extended beyond the deadlines provided in those letters.

In responding to this information request, St. Regis does not concede that it is a "responsible party" under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§9601 et seq. ("CERCLA"). In addition, St. Regis denies any liability under CERCLA or any statute, regulation, or law for any

Robert E. Leininger, Esq. June 22, 1983 Page 2

drums or for any other matter connected with or arising from the existence of Enviro-Chem Corporation and the so-called Enviro-Chem site at Zionsville, Indiana.

In responding to this information request, St. Regis has made a diligent search and has reviewed all records which it found to be in its possession pertaining to the specific facilities referred to in EPA's information requests: i) a Bag Division plant in Louisville, Kentucky; and ii) a Consumer Products Division plant formerly owned by St. Regis in Marion, Indiana. St. Regis has also reviewed other corporate records in order to determine whether any other St. Regis facilities or divisions may have made any shipments to ECC. No evidence of any such shipments has been found.

However, if further information demonstrates that any part of this submittal is incomplete in any material respect, St. Regis will so notify EPA Region V.

In order to facilitate this process, and to enable St. Regis to ensure the completeness of the information supplied herewith, St. Regis hereby requests that EPA Region V comply with the commitment it made at the April 13, 1983, meeting in Chicago and supply St. Regis with information in EPA's possession concerning any shipments which St. Regis, including any of its divisions, plants, or other facilities, may have sent to or received from ECC. Specifically, St. Regis requests any information in EPA Region V's possession which would, if in St. Regis' possession, be responsive to the information requests to which St. Regis is hereby responding.

Correspondence should be addressed to me, with a copy to:

Ms. L. Rettig, Esq. Senior Legal Counsel St. Regis Corporation 237 Park Avenue New York, New York 10017

If you have any questions regarding this request, please call me at the above number, or (Ms.) Lee Rettig, at (212) 808-6151.

Respectfully submitted,

homes & Mark

Thomas E. Mark

TEM:ph Enclosures

RESPONSE OF ST. REGIS CORPORATION TO EPA REGION V INFORMATION REQUESTS CONCERNING ENVIRONMENTAL CONSERVATION AND CHEMICAL CORPORATION, ZIONSVILLE, INDIANA

The following information constitutes the response of St. Regis Corporation, formerly St. Regis Paper Company, to EPA Region V's information requests, received on March 29 and April 8, 1983, relating to the Environmental Conservation and Chemical Corporation ("ECC") of Zionsville, Indiana.

In responding to these information requests, St. Regis does not concede that it is a "responsible party" under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §\$9601 et seq. ("CERCLA"). In addition, St. Regis denies any liability under CERCLA or any statute, regulation, or law for any drums or for any other matter connected with or arising from the existence of ECC and the so-called ECC site at Zionsville, Indiana.

In preparing its response to these information requests, St. Regis has made a diligent search and has reviewed all records which it found to be in its possession pertaining to the specific facilities referred to in EPA's information requests: i) a bag plant in Louisville, Kentucky;

and ii) a consumer products plant formerly owned by St.

Regis in Marion, Indiana. St. Regis has also reviewed other corporate records in order to determine whether any other St. Regis facilities or divisions may have made any shipments to ECC. No evidence of any such shipments has been found.

Response to Information Requests Nos. 1, 2, 4

Information Request No. 1

A description of each and every shipment of solid or liquid wastes, oils, sludges, caustics, acids or other materials that your company transported or had transported to the Enviro-Chem site during the period of its operation. The description shall include the following:

- a. Dates of transport
- b. Identity of transporter
- c. Method of transport
- d. Volume or quantity of materials per transport
- e. General description of the types of materials transported

Information Request No. 2

Copies of all records, contracts, invoices, manifests, bills of lading, ledgers, account books, correspondence or other documents evidencing both general and specific agreements or arrangements with Enviro-Chem or other companies or persons regarding the handling, disposal or treatment of waste at the Enviro-Chem site.

Information Request No. 4

Copies of all records, contracts, invoices, bills of lading, ledgers, account books, correspondence, or other documents evidencing agreements or arrangements for the transport of materials to the Enviro-Chem site.

Response

a. Shipments from Louisville, Kentucky

St. Regis' Bag Division operates a bag printing and fabricating plant at Louisville, Kentucky. Beginning in 1980 and continuing until February 8, 1982, St. Regis shipped spent printing solvents containing various ink wastes to ECC. These shipments were made pursuant to a March 20, 1980, "quotation" received by St. Regis from ECC. A copy of that quotation, with all attachments, is enclosed as Attachment 1.

The equivalent of 937 55-gallon drums were sent in 14 shipments on a periodic basis as the waste was accumulated. ECC then custom reclaimed the waste, and returned 489 55-gallon drums of reclaimed solvent in 12 shipments.

ECC transported the shipments in its own trucks from St. Regis. The shipments were customarily sent in truckload lots of 80 55-gallon drums. The dates of all known shipments are provided on the accompanying chart.

More detailed information regarding the volume or quantity

TABLE 1
SHIPMENTS BETWEEN ECC AND
ST. REGIS' LOUISVILLE BAG PLANT

<u>Date</u>	Identity of Transporter and Method of Transport	Drums of Spent Solvent Sent by St. Regis to ECC	Drums of Reclaimed Solvent Received by St. Regis from ECC
5/20/80	F.C.C. Truck	-	37
5/30/80	п	80	-
7/18/80	п	60	38
8/18/80	п	80	40
9/30/80	п	45	27
10/16/80	II	55	23
11/11/80	u	40	35
2/9/81	11	80	_
4/30/81	II .	80	88
7/27/81	n	80	27
8/25/81	u	-	23
9/14/81	n	80	-
9/22/81	п	-	36
11/6/81	11	80	-
11/10/81	п	60	-
11/19/81	н	-	66
1/29/82	11	78	-
2/8/82	u	39	-
3/31/82	11	-	49
TOTALS:		937	489

Percentage reclaimed: 52% Drums retained by ECC: 448

Source: See Attachment 2

of materials in each shipment is also provided in the form of the enclosed manifests, invoices, cancelled checks, and other documents, where available. (See Attachment 2.)

Because all shipments were transported by ECC, St. Regis had no other agreements or arrangements for the transport of materials to ECC.

In preparing this response, St. Regis has located materials, other than those included in Attachment 2, which may technically fall within the terms of EPA's information request. These materials, which are included as Attachment 3, and which include rough notes, informal memoranda, and waste shipment reports filed with the State of Kentucky, may or may not be read to suggest the existence of other transactions between ECC and St. Regis. However, St. Regis has been able to verify only those shipments listed on Table 1 and described in Attachment 2.

Thus, a pencil notation on a Requisition form suggests that St. Regis may have shipped 80 drums to ECC on February 2, 1980. However, the number of the purchase order (29365) listed for this supposed shipment is out of sequence, and is, in fact, identical to the number of the purchase order used for a shipment on February 9, 1981. Therefore, it is reasonable to conclude that no shipment from St. Regis to ECC took place on February 2, 1980, and that the date on the Requisition was intended as February 2, 1981.

Attachment 2), which contemplates a November 12, 1981 shipment. However, St. Regis has no evidence that a shipment occurred on that date. Pencil notes indicate that a shipment bearing the same manifest number as the November 10 shipment was originally scheduled for November 12. Given St. Regis' normal waste accumulation rate and the additional facts that i) 140 drums were shipped to ECC for recycling during the preceding week; and ii) there is no purchase order for the November 10, 1981 shipment, it is more reasonable to conclude that the November 12 shipment date on the purchase order is inaccurate and that the purchase order is, in fact, for the November 10, 1981, shipment. Therefore, it is also reasonable to conclude that there was no shipment on November 12, 1981.

Finally, Attachment 3 also contains informal notations that 80 drums were shipped to ECC for recycling on April 3, 1980. However, there is no formal documentary evidence demonstrating the existence of such a shipment. Although some notes included in Attachment 3 indicate that there may have been a shipment in April, other notes included in Attachment 3 indicate that the first shipment was on May 29, 1980. Therefore, the existence of such a shipment cannot be verified at this time.

b. Shipments from Marion, Indiana

St. Regis operated a paper plate manufacturing plant at Marion, Indiana, until December 1, 1982, at which time the plant was sold to Superior Paperware Company. Until the time of its sale, the plant was operated by St. Regis' Consumer Products Division.

St. Regis made one shipment from Marion to ECC for disposal by ECC. The shipment, which was made on November 18, 1980, consisted of 1300 gallons of water soluble waste printing solvents. The shipment was transported by ECC in a tank truck. See Attachment 4. St. Regis has no information that the Consumer Products Division made any other shipments to ECC.

Response to Information Request No. 3

Information Request No. 3

Copies of any and all documents relating to sampling or chemical analyses either performed by or on behalf of your company or communicated to you by some other party concerning materials transported to the Enviro-Chem site.

Response

a. Louisville, Kentucky

St. Regis did not perform or cause to be performed any sampling or chemical analyses of the materials transported by ECC to ECC from Louisville.

St. Regis' suppliers did provide analyses of the two pure solvents used in St. Regis' printing presses. These were known as 334 Blend and 86 Blend. The 334 Blend was a mixture of ethyl acetate (33.3%), N-propyl acetate (33.3%), ethanol (28.3%), isoproponol (3.33%), methyl isobutyl ketone (1.67%), and methanol (1.67%). The 86 Blend was a mixture of equal parts of ethyl acetate and methyl ethyl ketone.

Copies of these analyses, while not required by this Information Request, are available if requested.

In early 1982, after experiencing difficulties using the solvents reclaimed for it by ECC, St. Regis had a sample tested informally by an ink supplier, and complained to ECC about these problems. Although no formal written report of the testing was provided, St. Regis did retain handwritten notes of the telephone report of the analysis. A copy of the analysis and the subsequent correspondence is included in Attachment 5.

In May 1982 an analysis of St. Regis' reclaimed solvents was performed for St. Regis by Superior Solvent.

Although the material tested was not then sent to ECC, which was no longer in business, a copy of that analysis is also included in Attachment 5.

b. Marion, Indiana

No formal analyses of the printing wastes sent from St. Regis' Marion plant to ECC were performed.

However, St. Regis' records do contain informal notes of a telephone call from an ECC employee reporting on an analysis of the wastes sent from Marion to ECC. A copy of those notes is attached as Attachment 6.

Response to Information Request No. 5

Information Request No. 5

A complete listing of all past and present employees who authorized shipments of materials to the Enviro-Chem site. This listing shall include the employee's title.

Response

a. Shipments from Louisville, Kentucky

Shipments to ECC from St. Regis' Louisville plant were authorized by Henry A. Schumpf, Resident Manager, or S. A. Albritton, Personnel Manager. Mr. Schumpf is no longer employed by St. Regis.

b. Shipment from Marion, Indiana

The November 18, 1980, shipment to ECC from St.

Regis' Marion plant was authorized by Dallas Booth, Assistant Production Superintendent. Inasmuch as St. Regis no longer owns the Marion plant, Mr. Booth is no longer employed by St. Regis.

STATE OF NEW YORK)

COUNTY OF NEW YORK)

JOSEPH E. GORE, being first duly sworn, states that he is Assistant General Counsel and Assistant Secretary of St. Regis Corporation; that he has read the foregoing document and is authorized to sign it on behalf of St. Regis Corporation; that the foregoing responses are true and correct to the best of his knowledge and belief; and that they will be supplemented if further information demonstrates that any part of them is incomplete in any material way.

Joseph E. Gore

Sworn to before me this day of June, 1983

Notary Public

THOMAS ERIC MARK
Notary Public, State of New York
No. 24-4814825
Qualified in Kings County
Commission Expires March 30, 1985

Attachment 1

.



EPA-IND 08415995

ENVIRO-CHEM CORPORATION

RR 1 BOX 197A ZIONSVILLE, INDIANA 46077-(317) 769-6153

quotation

TO

St. Regis Paper
P. D. Box 21130
Louisville, Kentucky 40221

ATTN: Henry Schumtt

MAR 25 1580

St. regis paper co.
LOSTSYRLE TT.

WE ARE PLEASED TO QUOTE AS FOLLOWS:



ENVIRO-CHEM CORPORATION

RR 1 BOX 197A ZIONSVILLE, INDIANA 46077 (317) 769-3685 769-6753

PRICE QUOTATION

No. 1641

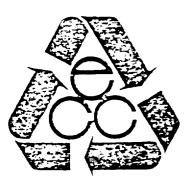
PLEASE INDICATE THIS NUMBER WHEN ORDERING

DATE	
March 20, 1980	
YOUR INQUIRY DATED	
PROPOSED SHIPPING DATE	
TERMS FCB	
vet 10 11 12 over 30 Days	•
SALESMAN	
STERLING	
TO BE SHIPPED VIA	PPD OF Co
ECC	

St. Regis Paper
P. O. Box 21130
Louisville, Kentucky 40221

ATTN: Henry Schumtf

tere is our quotation on the goods named, subject to the conditions noted: DESCRIPTION PRICE AMOUNT For the reclamation of ink solvent \$1.10/gallon (\$.85/gallon plus \$.25/drum deposit) For the transportation of reclaimed ink solvent \$2.50/loaded mile All waste material will be transported under the authority of Regulation SPC-17 and processed according to the regulations established by the Indiana State Board of Health. All barrels are to be properly gasketed and sealed, and of a condition that there be no leaking of the barrels. All barrels must carry the proper DOT labels. The bill of lading should list the nature of the contents of each drum. Any drum placed on an ECC truck that leaks from a bund gasket, hole or clamp, will be assessed an additional charge of \$50.00 per drum. Any drum containing a material which has not been authorized for pick up by ECC will be charged an additional \$100.00 per drum. Demurrage: Two hours are allowed for loading or unloading at no charge. Any additional loading time will be charged at the rate of \$50.00 per hour. THIS QUOTATION IS VALID FOR 30 DAYS.



ENVIRO-CHEM CORPORATION

R. R. 1 Box 197A Zionsville, Indiana 46077

Enclosed please find copies of our Indiana State permits for hauling, air pollution and disposal of still bottom residues.

We will be extracting solvents from your solvent bearing wastes prior to disposal of the still bottom residue. Our distillation units are capable of extracting 99% of the solvents from solvent bearing wastes. We have an ongoing program with the Indiana State Board of Health, Solid Waste Management Section to clear each type of still bottom waste prior to its disposal in the sanitary landfill.

Our solvent processing center is located at the Northside Sanitary Landfill on U.S. 421, 8.5 miles north of I=65. The landfill operates under state permit number 6-1.

If you have any questions please contact us by telephone or letter.

Sincerely,

Davic M. Finton

DF:js enclosure





INDIANAPOLIS 46206

(317) 633-4420

CONSTRUCTION PERMIT

TO: Enviro-Chem Corporation Permit Number: PC(06)1093

Box 197

Zionsville, Indiana 46077 Date Issued: May 5, 1977

Approval is hereby issued to construct a solvent recovery facility adjacent to the Northside Sanitary Landfill on U.S. 421 one mile south of S.R. 32. The facility will include:

- 1. A 200 hp York-Shipley high pressure boiler burning #2 through #6 fuel oil or natural gas.
- 2. Two 5,000 gallon storage tanks with submerged fill.
- 3. An Environmental System, Inc. closed-system consisting of a live steam still and a convection still capable of 99% solvent recovery.

Emissions will be at a level acceptable to Regulations APC 4R, APC 13, APC 15 and APC 17.

This Construction Permit is issued with the following conditions:

- 1. That the equipment be installed in accordance with the manufacturer's specifications.
- 2. That any change or modification from this approval shall be submitted to the Board for approval before any such change is made.
- 3. That the Board be notified when construction is completed so the filed operation permit application can be processed.

Ralph C. Pickard

Technical Secretary

RWO/cgp

cc: Boone County Health Department



STREAM POLICITION CONTROL BOARD

January 29, 1979

Mr. Doug Johnson Environmental Waste Management Box 217 Silver Lake, IN 46982

Dear Mr. Johnson:

Re: Disposal of Stillbottoms from Enviro-Chem Corporation, Zionsville

This letter acknowledges the request for disposal dated September 25, 1978, from Enviro-Chem Corporation.

Approval is hereby granted for disposal of 1,500 gallons per day of stillbottoms from Enviro-Chem Corporation's solvent recovery units at the Four-County Landfill, Operating No. 25-2, Fulton County. The waste is to be disposed of in the separate disposal area of the landfill and covered with a minimum of 12 inches of cover soil by the end of the working day.

The approval is granted subject to the following condition:

1. That only the solid portion of the stillbottom be landfilled. (The supernatant must be treated and disposed of by other means.)

This approval will be revoked if the landfill fails to maintain compliance with Regulation SPC-18. Any necessary local approval must be obtained from the Fulton County Health Department. The waste must be transported by a hauler who holds a valid Regulation SPC-17 license.

The approval granted on October 11, 1977, for disposal at the Northside Landfill, Operating No. 6-1, Boone County, is hereby voided.

If you have any questions, please contact Mr. Eggleston of the Solid Waste Management Section at 317/633-0176.

Very truly yours,

Oral H. Hert

Technical Secretary

JMEggleston/lgf

cc: Enviro-Chem Corporation

Fulton County Health Department
Northside Landfill
Boone County Health Department

STATE BOARD OF HEALTH AN EQUAL OPPORTUNITY EMPLOYER



INDIANAPOLIS

Address Reply to: Indiana State Board of Health 1330 West Michigan Street Indianapolis, IN 46206

March 31, 1977

Mr. David M. Finton Enviro-Chem Corporation 4600 Bluff Road Indianapolis, Indiana 46217

Dear Mr. Finton:

Re: SPC 15 Construction Permit Solvent Recovery Facility

Since it has been determined by the Plan Review Staff that you will not need an SPC 15 Construction Permit for your Solvent Recovery Facility, we are recommending to our office of Budget and Requirements that your application fee, Receipt No. H-56183, be refunded as soon as possible.

If you have any further questions, please contact David R. Barna of this office at 317/633-5273.

Very truly yours,

Michael L. Esarey, Chief Permits & Approval Section

Division of Water Pollution Control

DRBarna/qh

cc: Phyllis Miller Ron Lauritsen

Page 1 of 7 Operation Permit No. IN 0604-3040-11

Indiana Stream Pollution Control Board Authorization to Remove and Transport Liquid Industrial Waste

In compliance with the provisions of the Indiana Stream Pollution Control Board Regulation SPC-17,

> Enviro-Chem Corporation 865 S. State Road 421 Zionsville, IN 46077

is authorized to remove and transport liquid industrial waste in accordance with requirements and conditions set forth in this permit.

The permit shall become effective on January 1, 1980

This permit and the authorization to remove and transport liquid industrial waste shall expire at midnight, _____ December 31, 1980 _____. In order to receive authorization to continue operation beyond this date of expiration, the Permittee shall submit such information and forms as are required by the Indiana Stream Pollution Control Board no later than 60 days prior to the date of expiration.

Signed this 26 day of Ocember, 1979 for the Indiana Stream Pollution Control Board.

Page 1 of 7 Operation Permit No. IN 4910-1000-11

Indiana Stream Pollution Control Board Authorization to Remove and Transport Liquid Industrial Waste

In compliance with the provisions of the Indiana Stream Pollution Control Board Regulation SPC-17,

E.T. Liebtag 5560 Eroadway Indianapolis, IN 46220

is authorized to remove and transport liquid industrial waste in accordance with requirements and conditions set forth in this permit.

The permit shall become effective on February 1, 1980

This permit and the authorization to remove and transport liquid industrial waste shall expire at midnight, January 31, 1981. In order to receive authorization to continue operation beyond this date of expiration, the Permittee shall submit such information and forms as are required by the Indiana Stream Pollution Control Board no later than 60 days prior to the date of expiration.

Signed this 2/st day of January 1980, for the Indiana Stream Pollution Control Board.

Osal N. Newt-Technical Secretary Attachment 2

Attachment 3

TIME DATE 14:40 02/05/81

R.H. KENAN

70 :1-FPAN S.A. DLDHAM

TO THEROMO S.E. MILLER, CO. J. LARIGAN

TO 11-LANG E.V. RIEHL

TO: 11-LOUI H.A. SCHUMFF

TO: 11-NAZA F.A. ZANDO

TO: 11-PENS F.M. GARBER, CC: Y. NOMIYAMA, R. TRYCHEL

TO: 11-SALT H.L. RICHARDS

TO: 11-UCIT L.M. DUFRAINE, CC: F.E. BUCHANAN

TO: 11-WYNK CO: J. ROESKE, S.C. KEPPEL, S. STEPHENS

-AZARDOUS WASTE

 REGIS NEW YORK DEFICE AND CORPORATE ENGINEERING HAVE REQUESTED HEAT FOLLOWING INFORMATION BE FURNISHED THEM ON MONDAY, FEBRUARY 9. LEASE SEND ME INFO BY 9:00 A.M. ON MONDAY SO ANSWER CAN BE MADE.

1. IS YOUR FLANT ACCUMULATING HAZARDOUS WASTE AT RATE OF 2200 LBS. OR MORE PER MONTH?

- . HAS YOUR PLANT ACCUMULATED 2200 LBS. SINCE NOVEMBER 19, 1980? 3. PLEASE SUPPLY NAME OF YOUR HAZARDOUS WASTE HAULER, CONTRACT INFO AND EFA ID NUMBER OF HAULER. ALSO HAVE YOU VERIFIED EFA NUMBER
- DF HAULER? 4. WHAT IS NAME AND LOCATION OF DISPOSAL SITE, CONTRACT INFO, AND
- EPA NUMBER OF DISPOSAL SITE? HAVE YOU VERIFIED EPA NUMBER OF DISPOSAL SITE?

THIS INFORMATION IS TO APPLY ONLY <u>AFTER DATE OF NOVEMBER 19</u> AS THIS WAS DATE NEW EPA REGULATIONS TOOK EFFECT. WE REALIZE THAT MOST OF THE PLANTS ARE PROBABLY STILL NEGOTIATING NEW CONTRACTS. PLEASE SUPPLY WHATEVER INFO THAT YOU HAVE AVAILABLE.

Cit. Det Commissor - Chem Corporation
865 South Rol 421 geomentie And 46077

me 29,1980 of of Marie M 72/980

ST CEGIS

INTER-OFFICE CORRESPONDENCE

FROM

H. A. Schumpf

LOCATION

Louisville, Kentucky

DATE

March 27, 1980

TO

E. Tonn

R. Kenan

ENVIRO-CHEM CORPORATION

cc: S. Albritton
J. R. Cramsie

We have made arrangements for Enviro-Chem Corporation to distill a truckload (4M gal) of our gravure press waste.

Before I make final arrangements, I would appreciate your reviewing the attachments and giving me your comments one way or the other whether this organization will be acceptable for our purposes.

HS:ss

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8/10/10 80 "

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Jackie Swigert Secretary

We have to



John Y. Brown, Jr.

COMMONWEALTH OF KENTUCKY

DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION

BUREAU OF ENVIRONMENTAL PROTECTION DIVISION OF WASTE MANAGEMENT PINE HILL PLAZA

1121 LOUISVILLE ROAD
FRANKFORT, KENTUCKY 40601

NOTICE TO HAZARDOUS WASTE GENERATORS FEBRUARY 27, 1981

THE FILING DATE FOR THE KENTUCKY HAZARDOUS WASTE REPORT HAS BEEN EXTENDED FROM MARCH I, 1981 TO APRIL 15, 1981. THIS REPORT IS REQUIRED OF ALL GENERATORS OF HAZARDOUS WASTE PURSUANT TO 401 KAR 2:070 SECTION 12(5). ALTHOUGH EPA HAS SUSPENDED THEIR REQUIREMENT FOR A SIMILAR REPORT FOR CALENDAR YEAR 1980, THE DEPARTMENT FEELS THAT THE REQUIRED INFORMATION IS CRUCIAL TO PROGRAM DEVELOPMENT AND MANAGEMENT AND, CONSEQUENTLY, WILL REQUIRE THE FILING.

THIS EXTENSION IN FILING TIME IS BEING GRANTED DUE TO A DELAY IN THE DEVELOPMENT AND PRINTING OF THE NECESSARY FORMS. IT IS EXPECTED THAT THE FORMS WILL BE AVAILABLE FOR DISTRIBUTION ON MARCH 15, 1981. AT THAT TIME, COPIES WILL BE MAILED TO YOU. UPON RECEIPT OF THE FORMS, YOU SHOULD COMPLETE THEM FOR THE PERIOD JANUARY 1 THROUGH DECEMBER 31, 1980 AND RETURN TO: DIVISION OF WASTE MANAGEMENT, 1121 LOUISIVLLE ROAD, FRANKFORT, KENTUCKY 40601.

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT MR. ARTHUR S. CURTIS, JR. AT (502) 564-6716 EXTENSION 225.



DIVISION OF WASTE MANAGEMENT

production of the

KENTUCKY DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION $3\sqrt{100}$

HAZARDOUS WASTE REPORT

					•	!	
OR	THE	PERIOD	BEGINNING	1/1/80 ANI	D ENDING 12/31/8D	下	S

GENERAL INFORMATI	ON EPA ID NUMBER KYD006371868
INSTALLATION NAME	: St. Regis Paper Company
INSTALLATION MAIL	ING ADDRESS: Box 37020, Louisville, KY 40233
INSTALLATION LOCA	TION: 8004 Ashbottom Road, Louisville, KY
	COUNTY: Jefferson
CONTACT PERSON:	Al Albritton TELEPHONE: 502/361-1371
TYPE OF ACTIVITY:	☐ GENERATION ☐ RECYCLING ☐ TREATMENT ☐ STORAGE ☐ DISPOSAL
□ UNDERGE	OUND INJECTION
TYPE OF REPORT:	MANNUAL QUARTERLY QUANNANIFESTED WASTE
	RY SHEETS ATTACHED 1 WASTES REPORTED 1
TRANSPORTATION SE	RVICES USED
EPA ID NUMBER	COMPANY NAME
IND084259951	Enviro-Chem Corporation R.R.1, Box 197A Zionsville, Indiana 46077
	Zionsvine, indiana 400//
COMMENTS	
	em recycles our washup solvent and we purchase back our reclaimed They dispose of the stillbottom waste.
FOR TREATMENT, ST	DRAGE AND DISPOSAL FACILITIES ONLY
COST ESTIMAT	FOR: CLOSURE \$ POST CLOSURE \$
CERTIFICATION: I	CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM

CERTIFICATION: I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

H. A. Schumpf PRINT OR TYPE NAME

SIGNATURE J

4/15/81 DATE SIGNED

PAGE	1	Of_	1
1705		\sim	

KENTUCKY DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE INFORMATION SUMMARY

GENERAL INFORMATION

INSTALLATION NAME:	St. Regis Pa	per Company,	Louisvi l	le, Kentucky	EPA ID NUMBER:	KYD006371868
TYPE OF ACTIVITY:	X GENERATOR	□ RECYCLING	☐ TREATM	ent	□ DISPOSAL	
TYPE OF FILING:	ANNUAL REPORT	□ <i>QUARTERLY</i>	REPORT	\square REGISTRATION	□UNMANIFESTED WASTE REA	PORT
FILING PERIOD: BEGI	INNING	1-1-80	AND	ENDING 12-31-80		

WASTE SUMMARY

INE IMBER	DESCRIPTION OF WASTE	EPA WASTE NUMBER	DOT HAZARD CLASS	PHYSICAL STATE	AMOUNT OF WASTE	UNIT OF MEASURE	DISPOSITION	TRANSFER CODE	HANDLING METHOD
	Solvent base ink wash to be recycled.		FL	L	20,900 gal.	G	KYXT	IND 084259951	
							,		
	•								
								DWM-2	

-80 du 8,900 : 6 G 35 230

DIVISION OF WASTE MANAGEMENT

KENTUCKY DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE REPORT

FOR THE	E PERIOD BEGINN	IING <u>1-1-82</u>		AND ENDING1	2-31-82	
GENERAL INFORMATI	ION			EPA ID NU	MBER	
INSTALLATION NAME	E: St. Regis	Paper Co.				
INSTALLATION MAIL						
		Louisvil		40233		
INSTALLATION LOCA						
				COUNTY:	Teffers	on
CONTACT PERSON:						
TYPE OF ACTIVITY:					-	
_	ROUND INJECTION		. 022110			
TYPE OF REPORT:			□ ////// 3.1/	TEECHED WEEK		
					EDODMED	one
NUMBER OF: SUMMA	RRY SHEETS ATTA	CHED OHE		WASTES R	EPORTED	
TRANSPORTATION SE	DVICES USED					
EPA ID NUMBER	COMPANY NAME					
IND-08425991	Enviro Chem (uille l	'n		
IND-00423331	Enviro chem (corp. Zions	viiie, i			
IND-039994975	Superior Oil	Co. India	napolis,	In.		
COMMENTS						
COMMENTS			· • · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	
FOR TREATMENT, ST	ODACE AND DISD	OCAL EACTLIT	TEC OWN	 ר <i>ק</i>		
			TES UNL	······································	UDE C	
COST ESTIMAT	E FOR: CLOSUR	E \$		POST CLOS	JRE \$	
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CERTIFICATION: I FAMILIAR WIT	CERTIFY UNDER TH THE INFORMAT.					
	INQUIRY OF THE					
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	INCLUDING THE					
		D	سة رو			
S. Albritton			allle		_	-10-83
PRINT OR T	TPE NAME		S)	GNATURE		ATE SIGNED

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KENTUCKY DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE INFORMATION SUMMARY

GENERAL INFORMATION

INSTALLATION NAM	E: St. I	Regis Pap	er Company	Louisv	ille, K	у.	EPA II	NUMBER:	KYD-006371868	
TYPE OF ACTIVITY	: Digenerat	TOR DR	ECYCLING	□ TREATM	ENT []storage	□ DISPOSAL			
TYPE OF FILING:	BANNUAL RI	<i>EPORT</i> [OQUARTERLY	REPORT	□REGI	STRATION	□UNMANIFESTED	WASTE REP	ORT	
FILING PERIOD:	BEGINNING	1-1-82		AND	ENDING	12-31-82				

WASTE SUMMARY

LINE HUMBER	DESCRIPTION OF WASTE	EPA WASTE NUMBER	DOT HAZARD CLASS	PHYSICAL STATE	AMOUNT OF WASTE	UNIT OF MEASURE	DISPOSITION	TRANSFER CODE	HANDLING
1	Flammable Liquid	F003	FL	L	6,435	G	INXT	IND084259951	
2	Flammable Liquids	F003	FL	L	13,365	G	INXT	IND000780403	
	•								
								DWM-2	2/81

1982 1981 1980 49325 gol 117 dun 20 900 gal 22,000 gol = Was sypry 50 5 60 % 380 dum 400 dum

1084 Shope 1982 19800 gal

38 pm 28/8/2 18 30 1 18 30 mg 68

18 Jun x55 gals 4290 gal 1/29/82 4826

Emens Chen corp

218,81 13,365

L1191 73/5/01 - 575 h ... 68

LL751 73/L/6 ... 00+1 h ... 08

27171 78/L//5 yob 00+ h = yobs x x mmg 08

Hayander Ward de Statement hungs as

Waln boon to the 1-5.81

. 271 08/81/8 .. 0# 18/11/01 08/05/6 18/02/5 85 35 dum 12/9/80

" 08 08-11-8 08-05-6 08 18-08-5 08-8-H 08 240 dum 11-11-80

.578

1982 P.O. 31563 Shypeid 1-29-82 78 dum (429) chu 4826 147 mile of 2:93 = 430.71 P.O. 31564 Shipped 39en 55 golden, 2-8-82 en 4835 fronted mile \$293 - 131.00 Am 4912 Rec 2695 gal 3/31/82-47 dus. 150 mile x 293 - 439.50 Answer .03 gal 80. 85 Try of 117 dum x 55 gal = 6, 435 gal. Rec 2, 695 gal. Som offing 23 god per dum.

1981 2.2-80. 5/30/80 6/4/80 8/18/80 9/30/40/ 4/10/81 7/18/80 7/14/81. note Bohn lead 11.3.81 10. 80 11/4/81. 11/14/8/-Shoped 1982 mark 6592. 39L Manfed 0 2.9.81 -1/29/82 6591. 78de 80 4.30.81 m 2695 gel 9/14/18/ ne 47 da 4-1-82 11/6/8/. Shopped 117 day x55: 6435gar P.O. 80-4/21/81 ne 2695 gal 107 7/27/81-80 11/12/81 -

150 mile x 2250 = 375,000, 20, 31042 Shops 80 dum 11/6/81

Al. 4671 Re 11/20/81 -3,630 gal xº1.10 - 2,993.00 (66 dum 80 mb x 42,50 = 2200.00. All the 1960 gal + 55 = 36d (315600). Do. 30719 shoped 80 dams 9/14/81 (no chore.) De dim 4408 /8/28/81 23 dum 1265gal 18/28/1.50 Shopped 80 dum = 1/27/81 5 27 dum = 1485 gol \$ 1655.50 the thin 4313 12708 od \$ 250 per omite \$ 200.00. 48 dum x55god = 2640x 8290400 The house no 4086, 1,800 gol = 55= -87 don 18/05/H -mp 08 Filtys SE862.00 18-6-7 mp 08 July 57867.07

Ber 1981 - 5 land 80 dummer. = 400 diss : 2200gel

Ber 1981 5 land total 13,140 gal

Slog 8,960 gal Same approx 35 gal per dumm

Wash 15 gal.

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70 08/81/8 " of 20 08/21/01

19 -08/05/6

88

11-8-11-8

08-8-4

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Jackie Swigart Secretary

John Y. Brown, Jr. Governor

COMMONWEALTH OF KENTUCKY

DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION

BUREAU OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS MATERIAL AND WASTE MANAGEMENT PINE HILL PLAZA

1121 LOUISVILLE ROAD FRANKFORT, KENTUCKY 40601

May 8, 1980

50 H Sohungs

Mr. Al Albritton St. Regis Paper Company 8004 Ash Bottom Road Louisville, Kentucky 40213

Dear Mr. Albritton:

This letter is in response to our meeting on May 6, 1980, concerning St. Regis' registration as a hazardous waste generator.

When you receive the results of the analysis on the Flexographic Printing Press washwater, please forward a copy to this office. Upon review of this data, I will inform you as to what actions can be taken to dispose of this waste. If all the data indicates the waste is non-hazardous, we will contact officials at the Metropolitan Sewer District to determine if discharge into the sewer system is acceptable.

Utilizing Enviro-Chem is acceptable for recycling of the waste solvent from Gravure Printing Press, but I do suggest a representative from St. Regis visit their facility.

I have enclosed a list of companies which may be able to handle your waste streams should you decide to utilize a different facility.

Also, please send copies of the Material Safety Data Sheets on the printing inks. This information will help to determine if their are any other hazardous characteristic in the printing inks.

If you have any questions or if I may be of any further assistance, please feel free to contact this office.

Sincerely,

Charles Manafello

Charles Mansfield, Environmental Specialist

Division of Hazardous Material

& Waste Management

400 East Gray Street

Louisville, Kentucky 40202

588-4254

Enviro-Chem 865 S. State Road 421 Zionsville, Indiana (317) 769-6153 Contact: Dennis Sterling

CECOS International 9309 Montgomery Road Cincinnati, Ohio 45242 (513) 793-3090

Contact: Pete Kinickles

Landfill: Williamsburg, Ohio 45176

Chem Waste Management, Inc. 2131 Kingston Court S.E., Suite 112 Marietta, Georgia Contact: Thomas S. Eggers Louisville, Kentucky (502) 244-1252 Marietta, Georgia 1-800-241-7829

Chemical Waste Management of Springfield, Inc. formerly known as IWD Liquid Waste, Inc. 3106 Snyder Domer Road Springfield, Ohio 45502 Springfield: (513) 969-8346 Contact: Thomas S. Eggers

RAD Services, Inc. Hazardous Waste Division 4508 Hemway Drive Chester, Virginia 23831 (864) 748-5355 Contact: Tom Barbee

Regional Commerce & Growth Association (RCGA)
Midwest Industrial Waste Exchange
Ten Broadway
St. Louis, Missouri 63102
(314) 231-5555
Contact: Oscar S. Richards

Environmental Enterprises, Inc. 11750 Chesterdale Road Suite 804 Cincinnati, Ohio 45256 Contact: Dave Streng Dan McCabe (513) 772-2818

Nuclear Engineering Company, Inc. 9200 Shelbyville Road Suite 526, P.O. Box 7246 Louisville, Kentucky 40207 (502) 426-7160 Landfill: Beatty, Nevada ILWD, Inc. 7901 W. Morris Street Indianapolis, IN 42231 (317) 243-0811 Contact: Steven E. Pettit

Resource Recycling Technology, Inc. 2003 Gallatin Road Madison, Tennessee 37115 1-800-251-3287 Contact: Dan Burows

SIGEGE

INTER-OFFICE CORRESPONDENCE

FROM Henry A. Schumpf

LOCATION

Louisville, Kentucky

DATE

August 4, 1981

TO

J. M. Gittens

HAZARDOUS WASTE HAULER

cc: W. H. Freeman

B. J. Hammons

S. Albritton

Our flammable liquid waste is being picked up by:

Enviro-Chem Corporation 865 S. State Rd 421 R. R. #1, Box 1974 Zionsville, IN 46077

This printing solvent waste is being reclaimed and we purchase back the clean solvent and they dispose of the stillbottom waste.

We ship approximately 80 55-gallon drums every 70 - 90 days. The cost is \$2.50 per loaded mile. Enviro-Chem's EPA No. is IND 084259951.

SA:ss





COMMONWEALTH OF KENTUCKY

DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION BUREAU OF ENVIRONMENTAL PROTECTION

FORT BOONE PLAZA
18 REILLY ROAD
FRANKFORT, KENTUCKY 40601
January 18, 1982

Almoster of meet

NOTICE

"Hazardous Waste Generator Annual Reports"

All generators of hazardous waste as defined by 401 KAR 2:075 and 40 CFR 261 are required to submit a report annually outlining waste generated during the preceding calendar year.

The Annual "Hazardous Waste Report" for the period from January 1, to December 31, 1981, is due on March 1, 1982, as required by 401 KAR 2:070 Section 12 (5) of Kentucky Hazardous Waste Management Regulations. Please complete the enclosed form DWM-3 and return to:

Division of Waste Management Plans Review Section 18 Reilly Road Frankfort, Kentucky 40601

This year, please complete the "Handling Method" column on the far right side of the "Hazardous Waste Information Summary", form DWM-2, so recycling and on-site neutralization exemptions may be deducted from the quarterly hazardous waste assessment required by KRS 224.876. Use the transfer code column to indicate the <u>final</u> facility destination of the waste.

If you have any questions, please contact John Downes at (502) 564-6716, Ext. 243.

DIVISION OF WASTE MANAGEMENT

KENTUCKY DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE REPORT

FOR THE PERIOD BEGINNING 1-1-51 AND ENDING 12-31-51

GENERAL INFORMATION • EPA ID NUMBER
INSTALLATION NAME: ST. REGIS PAPER CO.
INSTALLATION MAILING ADDRESS: P.O. Box 37020
LOUISVIIE, KY 40233
INSTALLATION LOCATION: 8004 ASHBOTTON BD
CONTACT PERSON: S. ALBRITTON TELEPHONE: 502-361-1311
TYPE OF ACTIVITY: AGENERATION DRECYCLING DTREATMENT DSTORAGE DDISPOSAL
UNDERGROUND INJECTION
TYPE OF REPORT: DANNUAL QUARTERLY DUNMANIFESTED WASTE
NUMBER OF: SUMMARY SHEETS ATTACHED — CNE - WASTES REPORTED — (NE -
TRANSPORTATION SERVICES USED
EPA ID NUMBER COMPANY NAME
COMMENTS
NONE
NONE
FOR TREATMENT, STORAGE AND DISPOSAL FACILITIES ONLY
COST ESTIMATE FOR: CLOSURE \$ POST CLOSURE \$
CERTIFICATION: I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.
PRINT OR TYPE NAME PRINT OR TYPE NAME DATE SIGNATURE DATE SIGNATURE

KENTUCKY DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE INFORMATION SUMMARY

					7	LINE	INSTALLATION NAI TYPE OF ACTIVITY TYPE OF FILING: FILING PERIOD: WASTE SUMMARY
		•			(renting Sources For Richim)	DESCRIPTION OF WASTE	MATION ME: ST. RELIS FRICE. () C: DEPARTOR PRECYCLING THE PROPERTY REPORT PUBLISHED REPORT PROPERTY PROPERTY REPORT PROPERTY REPORT PROPERTY REPORT PROPERTY P
					E 72.7	EPA WASTE NUMBER	TMB
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					N	PHYSICAL STATE	TORAGE PRATION
					22,000	AMOUNT OF	EPA ID NUMBER: 🖄
					5	UNIT OF MEASURE	D NUME
				-	MXT	DISPOSITION CODE)ER: 🗴
C-MMU					2000 OF42	TRANSFER CODE	ID NUMBER: <u>XYW CKG37/766</u> 5D WASTE REPORT
						HANDLING	a.

OFFICE MEMO REPLY MESSAGE

	APER COMPANY	
J. Bargane	F Lallet	
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IF FOUND, CONTACT	HE NEAREST POLICE, OR	
U.S. ENVIRONMENTA	L PROTECTION AGENCY	X
	Legend Nos un OR NAM 1993	Ä.
GENERATOR INFORMATION	PER COMPANY	INITIA
ADDRESS 8004 ASHA	STATE KY ZIP 40213	
EPA ID NO KYDOG 6371868	WASTE NO FOO3	
ACCUMULATION START DATE	MANIFEST. DOCUMENT NO	Xª
HANDLE V		
	DUS OR TOXIC WASTES	
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C LABELMASTER, CHICAGO, IL. 60626

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Enviro Enviro Ses SEE Red 421. Finance Many 421. 317 769 6153,

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INTER-OFFICE CORRESPONDENCE

FROM JS. Albritton

LOCATION

Louisville, Kentucky

DATE

April 20, 1982

TO

Ralph Kenan

HAZARDOUS MATERIAL

cc: D. D. Knight
R. H. Loeffler
J. B. Peebles
Lena Rettig

Since May 1980 we have been using Environmental Conservation and Chemical Corporation, Zionsville, Indiana to pick up and transport our solvent base printing press washup material to their site for reclamation. We purchase back the clean reclaimed material and they are responsible for disposal of the stillbottom material.

I received a letter today from Bad Peebles suggesting that we find another facility to handle this material. We need guidance in selecting a facility in our area that meets EPA requirements to handle our material and which can be approved at corporate level.

Attached are copies of the Enviro-Chem Corporation agreement.

SA:ss

6.62WATER

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1550 TROACE.NO

1750 MACE.NO

1850 MOACT.

2890 MOACT.

2890 MOACT.

PAPER COMPANY

BAG PACKAGING DIVISION 8004 Ashbottom Road P.O. BOX 37020 Louisville, KY 40233 502/361-1371

1-25-82

Mr. Tony Clark
Enviro-Chem Corporation
R.R. #1 Box 1974
Zionsville, In. 46077

Dear Mr. Clark:

We have an agreement with your company to purchase the extracted solvent from our ink-washup material.

We had an analysis run on this material that we received from your company and it showed five different chemicals that we do not use in our plant.

We have approximately 100 drums that need to be reworked to get this material in a useable condition and also assurance that our material is not being mixed with other material at your location.

Please advise as we need to correct this problem before any more reclaim material is shipped.

Sincerely,

S. Albritton

Personnel Manager

SA:jj

cc: R. H. Toeffler

and the second

February 11, 1982

St. Regis Paper 8004 Ashbottom Road Louisville KY 40233

Attn: Mr. Albritton

Dear Mr. Albritton:

As per our conversation on Wednesday, February 10, 1982, I hope we have reassured you that we are greatly concerned about your material. As I stated yesterday, by looking back at the average analysis on the last four raw loads shipped to us and comparing this to the analysis of the last four clean drum loads shipped back to you, I observed very little difference.

When your material (a "custom" reclaim) is brought into our plant, we keep it separate from everything else. It is pumped into a raw feed tank by itself and then processed through the thin-film unit. The distillate is then collected into a tank, again by itself, and allowed to settle before being quality controlled and packaged.

You stated you had a sample drawn from one drum and tested. I feel this one drum sample does not represent the true picture. But looking into this further after I had talked with you, I did notice that the percent of dissolved water in your reclaim has varied, anywhere from less than one percent all the way up to six and seven percent. When we receive the sample of virgin ink wash from you, we will be able to compare it to our reclaimed material. We may have to start chemically drying your reclaim to help it match your virgin solvent or add back virgin streams to the reclaim to get it to match the original chemical composition. We can handle either of these easily.

So, I am looking forward to working with your sample. Please, feel free to call me if you have any questions or any other problems that I might be of some assistance to you.

Sincerely yours,

Tony D Clark

Tony D. Clark Quality Control

TDC/sbh

START ATTEN: X64

0.7% ALIPHATIC HYDROCARBONS

0.5 % ACETONE

> 8.5 % ETHYL ACETATE
> 11 % ISOPROPYL ALCOHOL

2 10% METHYL ETHYL KETONE

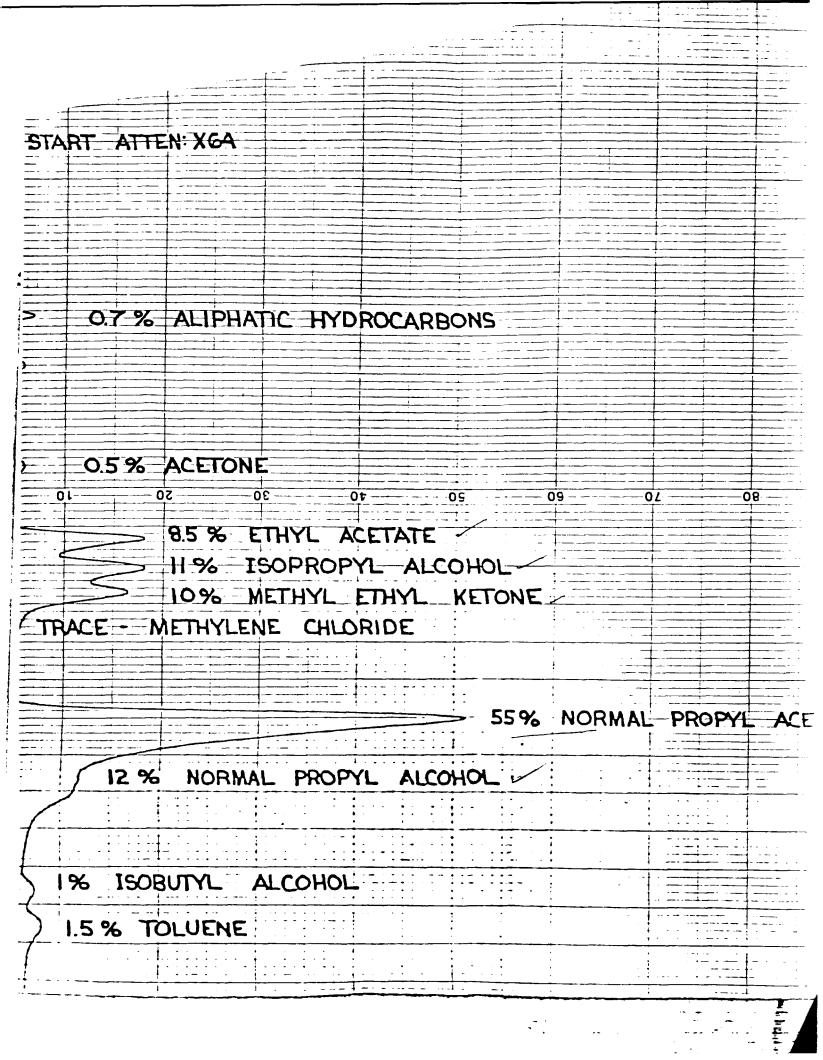
TRACE - METHYLENE CHLORIDE

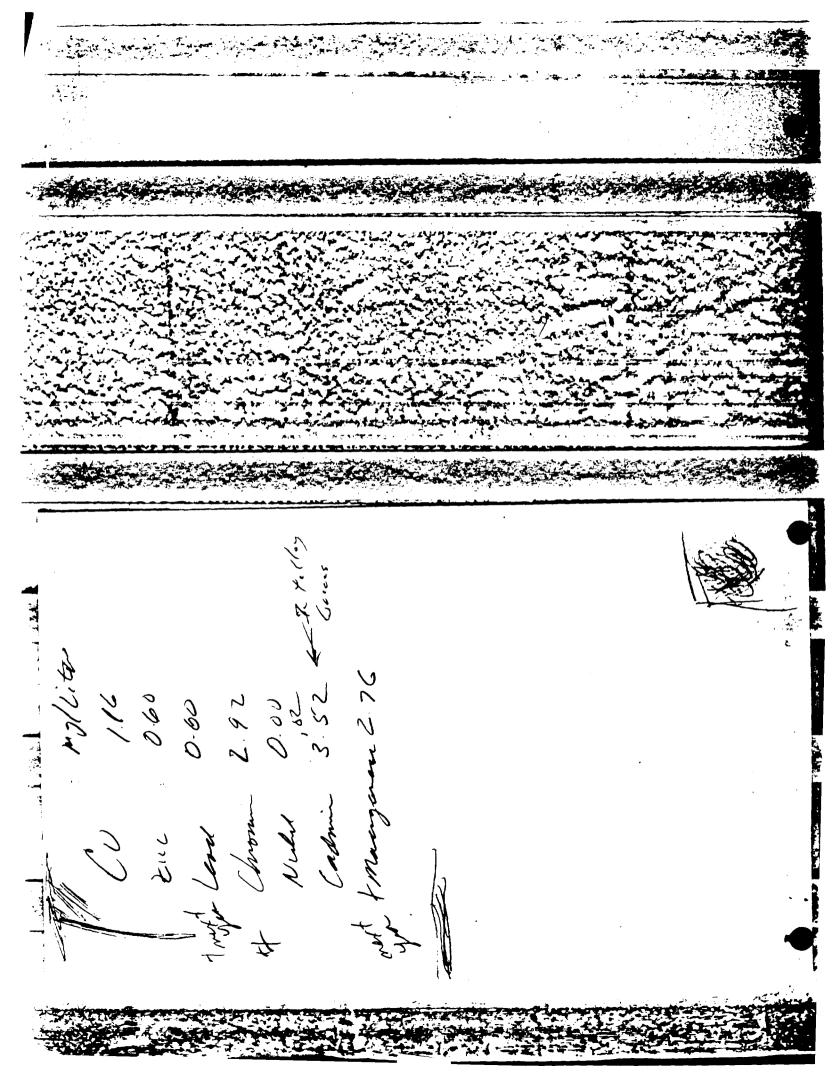
> 55% NORMAL PROPYL ACETATE.

12 % NORMAL PROPYL ALCOHOL

1% ISOBUTYL ALCOHOL

1.5% TOLUENE





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